

REMARKS

Claims 20-22, 24, 25, 27, 29-32, 34-37, 45-46, 48 and 50 are pending in this application.

Claims 20-22, 37 and 50 have been amended by the present Amendment. Amended claims 20, 37 and 50 do not introduce any new subject matter.

REJECTIONS UNDER 35 U.S.C. § 103

Reconsideration is respectfully requested of the rejection of (1) claims 20-22, 24, 25, 27, 29-31, 34-37, 45, 46 and 48 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,380,978 ("Adams") in view of U.S. Patent No. 6,371,345 ("Leyden"), and further in view of JP 06197245 ("Yoshioka"); and (2) claims 32 and 50 under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Leyden and Yoshioka, and further in view of U.S. Patent No. 6,216,927 ("Meritt").

Claims 20 and 50 recite, *inter alia*, that at least one rigid member is coupled to at least one headrest support member of a seat in a vehicle using a bracket, wherein the bracket includes a ring, and a circumference of the ring is larger than a circumference of the headrest support member to permit free movement of the ring around the headrest support member. Claim 37 recites, *inter alia*, that the other end of the at least one mounting post is attached to a headrest post of the vehicle seat using a bracket, wherein the bracket includes a ring, and a circumference of the ring is larger than a circumference of the headrest post to permit free movement of the ring around the headrest post.

Applicant respectfully submits that Adams, when taken alone, or in combination with Leyden, Yoshioka and/or Meritt does not disclose or suggest the bracket as

claimed.

In contrast to the claimed embodiments, the structure in Fig. 2A of Adams is not freely moveable around the headrest support member/post. Furthermore, in view of the structure of device in Fig. 2A, which is designed for stationary mounting, there is no motivation to modify Adams to include the claimed configuration, since such a modification would require substantial reconstruction and redesign of the Adams device, and change its principle of operation.

In addition, Yoshioka and Meritt do not cure the deficiency in Adams, as both the Yoshioka and Meritt devices are rigidly mounted to the headrest. Leyden is silent as to the claimed feature, and accordingly also does not cure the deficiency in Adams.

Accordingly, for at least these reasons, Applicant respectfully submits that claims 20, 37 and 50 are patentable over Adams in view of Leyden, Yoshioka and further in view of Meritt.

In addition, for at least the reason that claims 21, 22, 24, 25, 27, 29-32, and 34-36 depend from claim 20, and claims 45, 46 and 48 depend from claim 37, claims 21, 22, 24, 25, 27, 29-32, 34-36, 45, 46 and 48 are also submitted to be patentable over the cited references.

As such, Applicant respectfully requests that the Examiner withdraw the rejections of claims 20-22, 24, 25, 27, 29-32, 34-37, 45, 46, 48 and 50 under 35 U.S.C. § 103(a).

DEPENDENT CLAIMS

Applicant has not independently addressed the rejections of all the dependent claims because Applicant submits that, in view of the amendments to the claims

presented herein and, for at least similar reasons as why the independent claims from which the dependent claims depend are believed allowable as discussed, *supra*, the dependent claims are also allowable. Applicant however, reserves the right to address any individual rejections of the dependent claims should such be necessary or appropriate.

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, the Examiner may telephone Applicant's Attorney to reach a prompt disposition of this application.

Respectfully submitted,



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